

## REMARKS

In the Office Action mailed December 8, 2003, the Examiner noted that claims 1-6 were pending and rejected all claims. Claims 1, 5 and 6 have been amended, new claims 7 and 8 have been added and, thus, in view of the forgoing claims 1-8 remain pending for reconsideration which is requested. No new matter has been added. The Examiner's rejections are traversed below.

Page 2 of the Office Action rejects claims 1-6 under 35 U.S.C. § 103 over newly cited Agrawal.

The present invention (see claims 1, 5 and 6) creates one or more hierarchies or linking data structures for data to be totalized or added, such as the cost of goods. The specification and drawings provide an example with three hierarchies x, y and z. Each of the hierarchies allows the totalization to be arranged in a different way. For example, one hierarchy can arrange data according to the view of a person who typically purchases goods, so the goods are the leaves of the hierarchical tree. Another hierarchy can arrange that same data in a view that is easy for a manager or person in charge of a portion of a business to use, so that the plant or building where the goods are to be used are the leaves of the tree. The hierarchy has a number of different levels. When a user wants to perform a totalization operation, the user selects a hierarchy and can also select a level within the hierarchy. The system, utilizing the hierarchy and the level, totalizes the data of that hierarchy at the specified level. By linking the cost data in a number of different hierarchies, the present invention allows those involved in obtaining cost totals to easily determine totals for large amounts of data. In addition, the use of a hierarchy to organize the data to be totalized eliminates the need to classify data into categories, such as product type.

The Examiner has rejected claims 1-6 under 35 USC section 103(a) over Agrawal. Agrawal is directed to a system that is designed to find anomalies in aggregated data arranged in the form of a data cube and to highlight the anomalies for easy investigation. The data of the cube is to organized into classifications, such as product, market, etc. Each of the data cells in the system includes a field that is called a surprise field and indicates whether the data of the cell falls inside or outside an expected value or is anomalous as "compared" to other cell values according to a formula set forth in equation 2 (see col. 8, line 13). The marking of the cells as anomalous with a color or other highlighting allows a user to easily identify data, and related

data, that should be explored or examined more carefully by the user. Agrawal is not directed at nor does Agrawal suggest obtaining the totals based on predefined hierarchies as in the present invention. Nor does Agrawal suggest totalizing based on a hierarchy.

Further, the present invention displays a structure that includes a plurality of hierarchically related layers to allow a user to any one of the layers in such a manner that prompt display of a total or prompt display of a detail data section is possible. Agrawal does not teach or suggest such a structure nor does Agrawal provide the benefits and advantages noted above for such a structure.

In the Action, on page 3 the Examiner acknowledges that Agrawal does not teach the display of aggregated data in a form as "each individual user demands independently of data contents and regardless of a presence or absence of classification information for totalization" as recited in claim 1 (and as also recited in claim 5). On page 6 the Examiner also acknowledges that Agrawal does not teach totalizing when "classification information is unavailable for use in totalizing the information to be totalized" as recited in claim 6. Yet for both claims 1 and 6 the Examiner argues that the invention would be obvious because it would "ensure that any level of information or data aggregation to be stored and to be displayed on the group or level hierarchy of the data stored in the cube...". It appears that the Examiner may be impermissibly using hindsight in making a rejection of the claims over Agrawal.

It is submitted that the invention of independent claims 1, 5 and 6 distinguishes over the prior art and withdrawal of the rejection is requested.

The dependent claims depend from the above-discussed independent claims and are patentable over the prior art for the reasons discussed above. The dependent claims also recite additional features not taught or suggested by the prior art. For example, claim 2 discusses displaying totalization results for several hierarchical levels. Agrawal does not teach or suggest such. The remaining dependent claims also include patentably distinguishing features. It is submitted that the dependent claims are independently patentable over the prior art.

New claims 7 and 8 emphasize totalization hierarchies that are customized to a user's requirements and that allow the user to select levels therein. Nothing in the prior art teaches or suggests such. It is submitted that these new claims distinguish over the prior art.

It is submitted that the claims are not taught, disclosed or suggested by the prior art. The claims are therefore in a condition suitable for allowance. An early Notice of Allowance is requested.

Serial No. 09/788,391

If any further fees, other than and except for the issue fee, are necessary with respect to this paper, the U.S.P.T.O. is requested to obtain the same from deposit account number 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP

Date: \_\_\_\_\_

5/10/14

By: \_\_\_\_\_



J. Randall Beckers  
Registration No. 30,358

1201 New York Ave, N.W., Suite 700  
Washington, D.C. 20005  
Telephone: (202) 434-1500  
Facsimile: (202) 434-1501